

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MDL-1570 (GBD)(SN) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977

Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970

Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978

Euro Brokers v. Al Baraka Investment and Development Corp., et al., No. 04-CV-7279

Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al, No. 04-CV-1923

World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp., et al., No. 04-CV-07280

DECLARATION OF OMAR T. MOHAMMEDI PURSUANT TO OPINION
AND ORDER

Omar T. Mohammedi, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following are true and correct to the best of his knowledge:

1. I am an attorney admitted to practice before this Court and the lead counsel representing Defendants, World Assembly of Muslim Youth Saudi Arabia (WAMY SA) and the World Assembly of Muslim Youth International (WAMY Int'l) jointly referred to as "WAMY." I am the

managing partner of the Law Firm of Omar T. Mohammedi, LLC, counsel of record for WAMY. By Opinion and Order dated January 15, 2019, (ECF No. 4350), the Court ordered WAMY to produce a sworn declaration in accordance with 28 U.S.C. § 1746 describing in detail the efforts to locate banking documents from ten (10) branch offices as specified by the Plaintiffs' Executive Committees ("PECs"). This declaration is submitted in compliance with this order.

2. By letter dated January 25, 2019, the PECs provided counsel for WAMY with the following list of WAMY offices:
 - a. WAMY's Mecca Province in Jeddah, Saudi Arabia.
 - b. WAMY's Medina Province office in Medina, Saudi Arabia.
 - c. WAMY's Eastern Province office in Dammam, Saudi Arabia.
 - d. WAMY's Southern Province in Abba, Saudi Arabia.
 - e. WAMY's branch office in Peshawar, Pakistan.
 - f. WAMY's branch office in Kashmir (India).
 - g. WAMY's branch office in Azerbaijan.
 - h. WAMY's branch office in Sudan.
 - i. WAMY's branch office in the United States.
 - j. WAMY's branch office in Canada.

A true and correct copy of the letter is attached as **Exhibit 1**.

3. Following receipt of this list, counsel for WAMY continued the process of working with our client to comply with the Court's Order as to these 10 WAMY offices.
4. Well before the Court issued its Opinion and Order of January 15, 2019, WAMY's counsel has been working with WAMY to attempt to obtain a complete set of banking records from each of the ten (10) WAMY offices Plaintiffs listed as well as other WAMY chapters. These efforts have included the following:
 - a. In 2012, WAMY attempted to obtain banking records for the USA chapter. A copy of the initial letter is attached hereto and was produced at WAMYSA 016253. See **Exhibit 2**.
 - b. On or about May 5, 2012, WAMY attempted to obtain all pertinent banking records for the Sudan office. This effort consisted of WAMY Sudan office correspondences with Al Khartoum Bank on 11/4/2015 and Al Baraka bank 12/3/2015. WAMY received a response from Al Baraka bank in Sudan stating that they did not have any bank records for the period between 1/1/1992- 12/31/2002. A copy of that correspondence is attached hereto as **Exhibit 3** and was produced at WAMYSA5804, WAMYSA753559, WAMYSA753560, and WAMYSA5906694.

- c. On April 7, 2012 and May 5, 2012, WAMY made efforts to obtain all banking records for the Kashmir office. WAMY wrote to the head of this branch office requesting that they search for and produce these records. A copy of these written requests are attached hereto as **Exhibit 4** and were previously produced starting at WAMYSA 5767 and WAMYSA 16237.
 - d. On or about October 11, 2015, WAMY's headquarters in Riyadh, Saudi Arabia wrote directly to the heads of chapters directing them to obtain and produce to WAMY Saudi Arabia all banking records for the pertinent time period. Copies of the letters making the requests are attached hereto collectively as **Exhibit 5**.
 - e. On or about April 7, 2012, WAMY Saudi Arabia sent a request to the branch in Azerbaijan directing that they search for and produce all banking records during the pertinent time period. A copy of the letter making this request, with attachments, is attached hereto as **Exhibit 6**. These documents have been produced to the PEC starting at WAMYSA 5643.
5. Complying with this directive from WAMY Saudi Arabia in Riyadh, the head of the branch office in Pakistan, Ibrahim Anwar, wrote directly to banks with whom that chapter had bank accounts requesting bank statements for the period January 1, 1992 to December 31, 2004.

Copies of the letters making such requests are attached hereto as **Exhibit 7** and were previously produced starting at WAMYSA 658209.

6. In response to this directive from WAMY Saudi Arabia, Riyadh office, Arif Abdullah, director of WAMY's branch office in Azerbaijan, sent a request to the bank at which WAMY's Azerbaijan office had its accounts requesting bank records for the pertinent period. A copy of the letter making this request on or about December 6, 2015 is attached as **Exhibit 8**. The efforts of WAMY's headquarters in Riyadh to obtain records from the Azerbaijan office also included a letter on May 5, 2012. See **Exhibit 9**.
7. In 2015, WAMY Saudi Arabia requested from the Saudi American Bank in Saudi Arabia that they receive copies of all bank statements for all WAMY accounts with that bank for the period 1992 to 2002. See **Exhibit 10**. The Saudi American Bank responded that it had no responsive records. See **Exhibit 11**.
8. On or about March 3, 2016, the Standard Chartered Bank (Pakistan) responded to the request for WAMY banking records for the branch office in Peshawar, Pakistan that as to records for WAMY Pakistan branch office with that bank, "due to system upgradation and mergers, the statements prior to 2002 are not available with the Bank and

archive.” See **Exhibit 12**. A copy of this correspondence was previously produced to the PECs as WAMYSA 6089564.

9. In addition to the efforts made by the client, WAMY’s counsel was directly involved in efforts prior to the issuance of the Opinion and Order to obtain bank records within the scope of the 10 chapters noted by the PECs. On December 12, 2011, counsel attempted to obtain the assistance of the then ambassador for Saudi Arabia to obtain banking records for WAMY Saudi Arabia from the Al-Rajhi Bank. The first letter seeking such assistance was sent on December 2, 2011. A copy of this letter is attached hereto as **Exhibit 13** and was produced at WAMYSA 1983. A follow-up letter was sent on December 12, 2011. A copy of this letter is attached hereto as **Exhibit 14** also was produced at WAMYSA 1984.
10. On November 21, 2011, WAMY’s counsel wrote to the attorney representing the ambassador for Saudi Arabia, Nancy Dutton, Esq. A copy of the letter is attached hereto as **Exhibit 15** and was produced at WAMYSA 1982. In this letter WAMY’s counsel requested the assistance of the Saudi Arabian government in obtaining financial records from the Al-Rajhi Bank, National Commercial Bank, Arab National Bank, and other banks in Saudi Arabia for the period between 1992 and 2002 related to WAMY bank accounts. Counsel followed up on

this letter by writing directly to the ambassador from Saudi Arabia to the United States.

11. The extent of a response to these efforts were replies from the Arab National Bank to WAMY's Secretary General indicating that there were unable to provide records for the pertinent time period, 1992 to 2002, due to the large time gap. A copy of the response from these entities is attached hereto as **Exhibit 16**.
12. After the court issued the Opinion and Order and WAMY's counsel received the list of 10 chapters from the PECs, WAMY's counsel reviewed what financial records, including bank records, from the 10 chapters had been produced to date to the PECs. A chart showing what bank records have been produced to date for these 10 chapters is attached hereto as **Exhibit 17**. After conducting another search, WAMY could not locate more documents. As a result, WAMY communicated with the banks once more to comply with the Court's January 15, 2019 Opinion and Order.
13. Additionally, WAMY's counsel forwarded to the client the Opinion and Order along with the list of the 10 chapters and directed the client to search not only its records as maintained at WAMY's headquarters in Riyadh but also to contact the branch offices outside of the Kingdom to obtain all banking records for the pertinent time period.

14. WAMY has advised their counsel that in 2017, WAMY closed all of its offices within the Kingdom other than the headquarters in Riyadh. All of the functions and activities of the various offices around the Kingdom of Saudi Arabia were consolidated in WAMY's central office in Riyadh. All documents related to these regional offices located in Saudi Arabia were brought to the headquarters.
15. To assist the client in its search and retrieval of any banking records, as well as assist the client in its efforts to obtain any records if possible from banks within the Kingdom of Saudi Arabia, counsel supplied WAMY with a list of bank accounts broken down by office within the Kingdom of Saudi Arabia. A list of accounts broken down by office is as follows:

JEDDAH

1. Bank Ajazira WAMY Jeddah bank account# 0007-111111-0012002.
2. National Commercial A/C # 010087751120/1 from 6/15/200-12/14/2000
3. Al Rajhi A/Ct# 000608008600/1 from 4/1/1999- 3/312001
4. Al Rajhi A/C# 319608010028450 from 1/1/1419-1/14/1420.
5. Al Rajhi A/C# of 319608010010904 from 1/5/1419-1/14/1420.
6. Al Rajhi A/C# 4181, for WAMY from 10/25/1993-3/7/1997.
7. Al Rajhi A/C 319608010010912 from 12/4/1418-1/14/1420.
8. Al Rajhi A/C# 319608010010904 from 1/26/1418-1/4/1419, and A/C# 002844/3 from 9/13/1414-2/26/1418.
9. Al Rajhi Bank A/C# 319608010028468 from 12/4/1418-1/14/1420.
10. Al Rajhi A/C# 319608010028419, for the period between 1/5/1419-1/14/1420.
11. Al Rajhi Bank A/C# 20608010076001 from 9/14/1419-12/14/1419.

12. Al Rajhi A/C# 219608010028427 from 9/2/1418-10/2/1418, 2/26/1418-3/24/1418, 9/19/1414-9/11/1417.
13. Al Rajhi Bank A/C# 002845/0 from 9/19/1414-12/23/1417, 2/26/1418-3/23/1418 and 9/2/1418-10/2/1418.
14. Al Rajhi Bank A/C# 319608010028401 from 1/1/1419-12/14/1419.
15. Al Rajhi Bank A/C# 319608010028401 from 9/19/1414-10/21/1418.
16. Al Rajhi Bank A/C# 319608010028443 from 1/1/1419-12/14/1419.
17. Al Rajhi Bank A/C# 001090/4 from 12/11/1413-12/23/1417.
18. Al Rajhi Bank A/C# 00191/2 from 2/25/1990- 3/5/1993, 1/1/1998-1/21/1998 and 8/1/1996-8/14/1996.
19. Al Rajhi Bank A/C# 219608010028435 from 8/21/1414-10/1417 and 2/26/1418-10/2/1418.
20. Al Rajhi Bank A/C# 002841/9 from 7/12/1414-1/4/1419.
21. Al Rajhi Bank A/C# 319608010028427 from 5/1/1419-1/14/1420.
22. Al Rajhi Bank A/C#
000608003829,0006080666349,0006080666356,0006080666364,
0006080666406,0006080666414,0006080666433,0006080666448,000
6080666455,0006080666463,0006080666265,0006080666273,000608
0666281,0006080666299,0006080666307,0006080666315,000608066
6257,0006080666240,0006080666232,0006080666224,000608066621
6,0006080666216,0007080666208,0006080024887,0006080032138,0
006080024770,0006080051021,0006080051039,0006080057507,
0006080057523, 0006080058182, 0006080063539 for the period
between 1/18/2002-2/18/2002.
23. Al Rajhi Bank A/C# 004910/7, 003035/4, 001905/8, 503000/1,
403000/2, 303000/3, 203000/4, 103000/5, 006460/1, 004150/8,
014184/0 from 6/29/1995-3/20/1996.
24. National Commercial A/C# 14014040000104, 14048002000110,
35147750000108 for the year 2002.
25. Al Rajhi Bank A/C# 0006080000604 from 1/2/2001-2/10/2001,
0006080666323 from 3/5/2003-2/20/2004.
26. Al Rajhi Bank A/C# 004910/7, 003035/4, 001905/8, 503000/1,
403000/2, 303000/3, 103000/5, 006460/1, 203000/4, 004150/8,
014684/0, 04150/8.
27. Al Rajhi Bank A/C# 06080010903 for the period between
1/2/2003-2/5/2003, A/C# 3035/ from 10/2/1997.
28. National Commercial Bank A/C# 11613455000109 from 1/1/1997-
12/22/1997.
29. Arab National Bank A/C# 01008/775113/01 from 5/16/1998-
6/15/1999.

30. Arab National Bank A/C# 01008/775112/02 from 11/30/1994-2/15/1998. A/C# 67008/775112/01 from 6/30/1994-11/16/1996. A/C# 0/008/7751/00 from 3/31/1985-6/23/1994.
31. Arab National Bank A/C# 01008/0775112/01 from 10/14/1999-6/14/2001. A/C# 67008/0775112/01 from 6/14/2001-12/15/2003. A/C# 0006080076001 from 1/1/1423-3/27/1423.
32. Al Rajhi Bank A/C# 006080076001 from 10/6/1421-1/13/1424 A/C# 0006080028468 from 12/6/1421-9/16/1422 A/C # 0006080028450 from 12/6/1421-9/16/1422 A/C # 0006080028443 from 12/6/1421-10/14/1422 A/C# 0006080028435 from 12/6/1421-2/3/1424 A/C# 0006080028427, 0006080028419, 0006080028401, 0006080010912 from 12/6/1421-2/3/1424.
33. Arab National Bank A/C# 204-67-008-001/0071290-8.
34. Al National Commercial Bank A/C# 140140400000104, from 9/1/1418-2/18/1420; A/C# 140108500000105, from 11/13/1419-12/14/1419.
35. Al Rajhi Bank A/C# 007600/1 from 8/10/1416-5/2/1419; A/C# 44/3 and 41/9 from 3/28/1418-4/28/1418.
36. National Commercial Bank A/C# 140140400000104 from 12/30/1997-6/2/1999
37. National Commercial Bank A/C# 140108500000105-11613455000109
38. Al Rajhi Bank A/C# 1090/4- 1091/4- 2846/8-2845/0-2844/3/2843/5-2842/7-2841/7-2840/1-7600/1-4910/7-3035/4-6460/1--007600/1
39. Arab National Bank A/C# 01008775112/01- 6700877511301
United Saudi Commercial Bank A/C# 714535-000-3110-01.
40. National Commercial Bank A/C# 14010850000105 from 9/1/1996-3/31/1998
41. Arab Islamic Bank A/C# 201-03-40-05-000038-1
42. United Saudi Commercial Bank A/C# 714535-000-3110-01 from 4/30/1994-7/31/1997
43. Riyadh Bank A/C# 10408500299901 for 2001-2002

WAMY Southern Province, Saudi Arabia (Abha)

1. Al Rajhi A/C# 11060801023200/4 from 12/1/1997-7/18/2001.
2. Al Rajhi A/C# 11060801023200/4 6/4/2000 to 12/31/2000.
3. Al Rajhi A/C# 1210004 - 2120001- 6500010 - 0208013888/0-10608010285887 from 1/1/2000-12/31/2000
4. National Commercial Bank account# 14044000108
5. Al Rajhi A/C# 13663/7 from 3/1/2000-12/31/2000

6. Al Rajhi A/C# 43514044000500 from 6/1/2000- 12/31/2001
7. Al Rajhi A/C# 0006080004446 from 1/1/2000-12/31/2002
8. Al Rajhi A/C# 006080171046 from 7/1/2004-12/7/2004
9. Al Rajhi A/C# 0006080171038 6/1/1003-12/7/2004
10. Al Rajhi A/C# 000608053333/1.
11. Al Rajhi A/C# 06080522227 for the period between 7/1/2002-7/21/2002.
12. Al Rajhi A/C# 608010232004 for the period between 2/1/1998-3/30/1998 and 7/1/1998-7/31/1998.
13. Al Rajhi A/C# 10043325 for the period between 4/1/2000-6/30/2000.
14. Al Rajhi A/C# 100202020400-100202020900- 0006080232004 for 1/1/2001-3/14/2002, 0006080136637 - 000608013888/0 and 000608018399/2 A/C # 000608028588/7 for the period between 1/1/2001-3/14/2002.
15. National Commercial Bank, account numbers of and 43514044000500.

MEDINA

1. A/C# 2977- 1486- 1485 - 2977 - 1486- 1485 - 9941 - A/C# 207- 35147750000108 - 101 - 109 - 30140000000106 - A/C# 2037333 A/C# 9940 - A/C# 9941
2. AL Rajhi A/C# 2977- 1486- 1485 - 2977 - 1486- 1485 - 9941 - 752/01/07/9
3. National Commercial Bank A/C# 207- 35147750000108 - 101 - 109 – 30140000000106
4. Arab National Bank A/C# 2037333
5. Riyadh Bank A/C# 9940 - A/C# 9941

DAMMAM/EASTERN PROVINCE

1. National Commercial Bank account# 47747000/208 - A/C# 49888000/103
2. Faisal Islamic Bank A/C# 109-4118367-260 - 109-4118367-277 - 109-4118367-390 - 109-4118367-434
3. National Commercial Bank A/C# 8047747000/100 - 8847464000/106 - 8047747000/209 - 8849888000103- 8047747000/405 - 8047747000/307 - 8047747000/710 - 8047747000/601- 8047747000/503.

4. Arab National Bank 1008/3000550/00 - 1008/3000827/00 -
1008/3000828/00 - 1008/3000831/00 - 1008/3000831/00 -
1008/3000832/00 - 1008/3000833/00 - 1008/3000830/00 -
1008/3000829/00
 5. Al Rajhi 5053/2 - 11333/0 - 7277/1 - 7009/6 - 10111/4 - 7372/9 -
21000/0 - 9888/7 - 01/011/2633.
 6. Banque Saudi Fransi 71999900164 - 719999161 - 719999455 -
71999900552 - 71999900358
 7. Saudi British Bank 044/180180/001 - 044/180180/002 -
044/18018004 - 044/180180005 - 044/180180006 - 044/180180003 -
044/180180007.
 8. Riyadh Bank A/C# 3140462089901 - 3271974449950 -
3271974449951 - 3271974449952 - 3271974449954 - 3271974449953
- 3271974449956 - 3140462089901 – 3271974449955
16. Following the direction of counsel, WAMY also again reached out to branch offices in Azerbaijan in attempt to obtain banking records during the pertinent time periods. Copies of the letters sent from WAMY SA headquarters in Riyadh to these branch offices and the bank's response explaining its lack of responsive documents are attached as **Exhibit 18**.
17. WAMY has advised their counsel that WAMY has never had an office in Kashmir (India).
18. In response to the directive of counsel, WAMY also sent requests directly to the Al-Rajhi Bank requesting copies of bank records for all of the included accounts for the period 1992 through 2002. A copy of the letter is attached as **Exhibit 19**. WAMY also sent a request to the Al Jazira Bank requesting all bank statements during the pertinent time

period. A copy of this letter is attached as **Exhibit 20**. Additionally, WAMY requested records from National Commercial Bank, Riyadh bank, Saudi Hollandi, and Saudi British Bank during the pertinent time period. A copy of this letter is attached as **Exhibit 21**.

19. As a follow up, on February 28, 2019, I, along with co-counsel Frederick Goetz, met with the Secretary General and Assistant Secretary General of WAMY in Jeddah, Saudi Arabia. A full day of meetings was devoted to the production of financial records. Counsel explained in detail to the client the requirements of the Court's Order, and the scope of the inquiry together with a list of specific accounts and banks for WAMY's offices both within and outside of the Kingdom of Saudi Arabia. Counsel and the client together worked through what had been done and what needed to be done to either obtain bank statements for all of the accounts or exhaust the available efforts to get them.
20. To assist the client in the process, WAMY's United States counsel had WAMY engage the services of a lawyer in the Kingdom of Saudi Arabia specifically to assist in obtaining records from financial institutions and banks within the Kingdom of Saudi Arabia, Ibrahim Bin Mohammed Alshalan. Following up on the requests for financial records that WAMY Saudi Arabia had previously sent to banks within the Kingdom, Mr. Alshalan also requested the subject financial records for the period

from January 1, 1992 to December 30, 2002. See, e.g., accompanying Declaration of Ibrahim Alshalan sworn to April 1, 2019.

21. WAMY's United States counsel emphasized to Mr. Alshalan that he would need to follow-up on the client's direct inquiries to the banks to get these records, do everything he could to expedite the production of the records or, if production could not be accomplished, report back to WAMY's United States counsel as to the exact reason why.
22. WAMY was partially successful in obtaining bank records from the branch office in Sudan. Records were available for the year 2002 and these have been produced to the PECs at WAMY WAMYSA664757 - WAMYSA664787; WAMYSA711644 - WAMYSA711682; and WAMYSA664757 - WAMYSA664787.
23. While in Jeddah, Saudi Arabia, WAMY's United States counsel also met with the director of WAMY's branch office in Pakistan. WAMY's United States counsel explained exactly what records needed to be obtained from the banks not only for the WAMY branch office in Peshawar, Pakistan, but also for the branch office in Kashmir. As a result of this meeting, letters were sent to the Habib Bank Ltd. and MCB Bank seeking copies of bank records from WAMY's branch office in Kashmir, Pakistan. A copy of this letter is attached hereto as **Exhibit 22**.

24. Counsel sent requests for WAMY USA banking records for the pertinent time period to the following financial institutions along with a copy of the Court's Order and Opinion of January 15, 2019:
 - a. Bank of America (see **Exhibit 23**);
 - b. First Union Bank (now Wells Fargo) (see **Exhibit 24**); and,
 - c. Central Fidelity National Bank and Wachovia Bank (now Wells Fargo) (see **Exhibit 25**).
25. In response to the letter requesting records for WAMY USA from Bank of America, WAMY's counsel received a response on March 12, 2019, that the Bank of America was unable to fulfill the request. A copy of the response is attached hereto as **Exhibit 26**.
26. WAMY's counsel thereafter issued a subpoena duces tecum to the Bank of America incorporating the letter of March 8, 2019 which set forth all the specific accounts. See **Exhibit 27**.
27. In response, WAMY's counsel received a letter from the Bank of America indicating that they are not able to produce the requested records as they are beyond the Bank's document retention period. See **Exhibit 28**.
28. WAMY's counsel also attempted to obtain WAMY USA banking records from JP Morgan Chase. See **Exhibit 29**. The bank responded that it was unable to locate these records. See **Exhibit 30**.

29. In response to the request for WAMY USA bank records to Wells Fargo, WAMY's Counsel received a response from the Wells Fargo legal department that it was unable to locate responsive records due to document retention. A copy of Wells Fargo's April 1, 2019 response is annexed hereto as **Exhibit 31**.
30. In response to the request for WAMY USA bank records to PNC, WAMY's Counsel received a response from PNC indicating that they were not able to produce any electronic records relating to the request due to the passage of time. They have located approximately two-hundred boxes of paper and microfiche/microfilm documents that could be reviewed; however, they did not believe that these boxes contained any account records for WAMY USA. The bank estimated the cost to retrieve the boxes at \$20, 000. In addition, the estimated cost for the bank to review these documents is \$25-\$75. See **Exhibit 32**. If Plaintiffs are willing to pay for the search WAMY will make arrangements.
31. As to WAMY's branch office in Canada, WAMY's counsel has already produced to the PECs whatever bank records were within WAMY's possession and control. Whether WAMY Saudi Arabia has the ability to produce additional WAMY Canada banking records, i.e. whether such records are within WAMY Saudi Arabia's possession or control has already been litigated extensively before Magistrate Judge Frank

Maas. The relationship between WAMY Saudi Arabia, and WAMY's former branch office in Canada, and those individuals who maintain the records for such branch office, has completely deteriorated to the point where WAMY Saudi Arabia effectively has no control whatsoever over WAMY Canada. Ultimately, Judge Maas found that WAMY Saudi Arabia did not have control over the records maintained by WAMY Canada and was not required to produce them. See ECF No. 2815 and Dkt. No. 3912-21 (2.19.14 Trans. at 39:6-11; 40:3-5). Notwithstanding, in furtherance of its attempts to obtain WAMY's financial records, WAMY cooperated with the PECs in submitting Letters Rogatory to the Canadian Revenue Agency ("CRA") in May 2012. A copy of the application is annexed hereto as **Exhibit 33**. As a result, in addition to the WAMY Canada documents WAMY was able to produce, the PECs received documents concerning WAMY Canada from the CRA. Attached hereto please see **Exhibit 17** listing WAMY Canada financial documents produced.

I declare under penalty of perjury, that the above is true and correct to the best of my knowledge.

Dated: April 1, 2019

A handwritten signature in black ink, appearing to read 'Omar T. Mohammadi', is written over a horizontal line.

OMAR T. MOHAMMEDI